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be said to be insurances for employees against such injuries only where there is some causal connection between the employment and the injury. On the question as to the existence of such causal connection see 16 MICH. L. REV. 179. See also *Cennell v. Daniels Co.* (Mich.), 168 N. W. 1009.

WORKMEN'S COMPENSATION—WORKMEN WHO ARE TO BE COUNTED IN MAKING UP REQUIRED NUMBER.—Part A, Sec. 2 of Connecticut P. A. 1913, C. 138, the Workmen's Compensation Act of that state provides that the Act shall not apply to employees of any employer "having regularly less than five employees," etc. Defendants, conducting an amusement park, had three employees who quite clearly were "regularly" employed; claimant's deceased was one of these. On two nights of each week, when the weather was good, dances were given, the music being furnished by two orchestras of three or more pieces each, sometimes one orchestra being on duty, at other times the other. *Held*, the musicians were properly counted in making up the required number of five employees. *Boyle v. Mahoney & Tierney* (Conn. 1918), 103 Atl. 127.

So far as the musicians were concerned the attention of the court seems to have been directed to the question of their being employees of independent contractors; having concluded that they were not such, the court apparently takes it for granted that they were "regularly" employed. Quite a number of states have similar limitations in their workmen compensation acts, but there is a complete dearth of authority as to what sort of employees are to be counted in making up the specified number. Suppose an employer has four regular employees and a scrubwoman who comes in to clean up the office once each month. Is she to be counted as making up the required five? Or suppose a small corporation has clearly four such employees and has arrangements with the cashier of a local bank to keep the books and act as secretary, not, however, as an officer. Should he be counted as the fifth? In the absence of a controlling definition in the Act itself, it is proper to look to the object sought to be attained. Why was the Act limited to employees whose employer has regularly five or more employees? A comprehensive scheme for compensation to injured workmen grew out of a feeling, first of a certain inequality between employee and employer, and, second, that the industry should bear the burden resulting from injuries received in the course and out of employment. A number limitation as in Connecticut, it is believed, was put into the statute because it was felt that there was need of such sweeping changes in liability only where an employee by reason of being one of many was more exposed to industrial accident. The Kansas Act (Laws 1911, C. 218, §8) provides expressly: "It is hereby determined that the necessity for this law and the reason for its enactment, exist only with regard to employers who employ a considerable number of persons. This Act, therefore, shall only apply to employers by whom five or more workmen have been employed continuously," etc. In view of these considerations it is believed that it is questionable whether the court in the principal case should have counted the musicians. See in general, *Jeffrey Mfg. Co. v. Blagg*, 235 U. S. 571.